



Ganfer
Shore
Leeds
&
Zauderer LLP

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360 Lexington Avenue
New York, New York 10017
Robert I. Gosseen
Tel: 917.951.6730
rgosseen@ganfershore.com

MEMO ENDORSED

March 14, 2023

BY ECF

Hon. Colleen McMahon, USDJ
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Bektasevic et al. v. East End Associates, Inc. et al.*,
S.D.N.Y. Case No. 22 CV 9097 (CM)

Your Honor:

I represent defendants and write to request that the initial conference in the above-referenced action currently scheduled for March 23, 2023 at 11:00 a.m. be adjourned to a date after March 29, 2023.

In my March 10, 2023 letter to Your Honor requesting that the defendants be given until April 17, 2023 to respond to plaintiffs' complaint (Dkt. No. 27), I noted that I will be out of the country and traveling from March 16 through March 28, 2023 owing to a long-standing prior commitment, and requested that the initial conference be conducted after March 29, 2023.

In Your Honor's Order granting defendants' request to have until April 17, 2023 to respond to the complaint (Dkt. 28), the initial conference was set for March 23, 2023. As I am defendants' trial counsel; the attorney in my firm with the greatest familiarity of the case; and due to my travel schedule, I respectfully request that the initial conference be adjourned until after March 29, 2023. Plaintiffs' counsel has informed us that he does not object to this request.

With the exception of my March 10th letter (Dkt. No. 27), defendants have not made any other requests for relief in this case.

Respectfully submitted,

Robert I. Gosseen
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cc: All counsel of record (by ECF)

William Harra (by email)

Giovanni Gallizio (by email)

Matteo Gallizio (by email)

Marco Gallizio (by email)